

Comments in Response to Localism Notice of Proposed Rulemaking

MB Docket No. 04-233

I am writing regarding the Federal Communications Commission's Report on Broadcast Localism and Notice of Proposed Rulemaking (MB Docket No. 04-233). I have concerns regarding certain aspects of the proposals in the Report that are decades old regulations and would impose substantial burden on broadcast radio in what is a highly competitive media industry. As a radio station manager, I would urge the FCC to reconsider these actions.

A main concern is the proposed reinstatement of the Main Studio Rule, which was relaxed in 1987. If this were to be reinstated, our Wausau/Stevens Point operation would have to invest in studios, facilities, and personnel in Mosinee, WI and Rudolph, WI which are outside the two locations we currently operate (Wausau and Plover, WI). Our current studio locations already serve these areas quite effectively. Having studios in these other remote locations in no way would enhance our ability to more effectively interact with our communities...it would only increase costs. Advances in technology have made this Main Studio Rule redundant and cost prohibitive in today's marketplace. The addition of further facilities would significantly increase our operating costs, administrative costs, taxes, strap revenue, etc. which would significantly effect our efficiencies and force the operation to look at other areas to cut expenses. The over all effect would be a reduced ability to provide quality and community oriented programming.

Another concern is the proposal to require stations be manned during all hours of operation. Our current systems in no way hinder our ability to provide emergency information or meet the needs and interests of our communities. Requiring a substantial investment in personnel for a 6 station group in this community would only force cuts elsewhere to remain competitive which would be counterproductive to the goal of serving our community. We pride ourselves on what we are currently doing to serve our community and have recently submitted a report outlining all of that. We also feel we have the best severe weather coverage and emergency coverage in our area...the reinstatement of this policy would only hinder or damage what we have built by increasing costs to the point of forcing cutbacks elsewhere.

When it comes to serving our community, we are already actively working to ensure we meet our public interest requirements. As a broadcaster, we serve the needs of our community every day with relevant local news, emergency

alerts, school closings, road conditions, and important weather information. We run a heavy load of Public Service Announcements and Community Affairs Programs. We provide nonprofit organizations free exposure. We team up and help sponsor local events, fairs, performing arts foundations, and museums. We also work heavily with local charities and fund raisers with direct donations or promotional support to substantially increase community awareness. We have been applauded for our work in this area and would question what the benefit of permanent community advisory boards would be? We cover a vast geographical area and would question what communities would make up this board? How many from each area? Would all communities in our listening area be represented equally? It would be an organizational and bureaucratic nightmare. For an industry already meeting or exceeding these requirements, the unfair burden would weigh us down while leaving other media (including cable, satellite, and internet) free to compete without comparable interference.

We appreciate the Commission's obligation to the public and its work to protect the nation's airwaves. However, I urge the Commission take into account the concerns of the licensees and reconsider reinstating these outdated rules and policies.

Sincerely,

Brett Lucht
Market Manager
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Wausau/Stevens Point, WI